

**DRAFT**

TENNESSEE AIR POLLUTION CONTROL BOARD  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
NASHVILLE, TENNESSEE 37243-1531



**OPERATING PERMIT (Conditional Major)** Issued Pursuant to Tennessee Air Quality Act

**Date Issued:**

**Permit Number:**

455498

**Date Expires:** April 1, 2014

**Issued To:**

ProCote, Inc.

**Installation Address:**

1500 Hal Henard Road  
Greeneville

**Installation Description:**

01: Surface Coating Operation  
Electro Deposition Process with Dip Tank and Curing Oven

**Emission Source Reference No.:**

30-0178-00  
CONDITIONAL MAJOR SOURCE

The holder of this permit shall comply with the conditions contained in this permit as well as all applicable provisions of the Tennessee Air Pollution Control Regulations.

**GENERAL CONDITIONS:**

1. The application that was utilized in the preparation of this permit is dated June 14, 2002, and signed by Ronald Jones, President of the permitted facility. If this person terminates his employment or is reassigned different duties such that he is no longer the responsible person to represent and bind the facility in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification shall be in writing and submitted within thirty (30) days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the facility in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

(conditions continued on next page)

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TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

NON TRANSFERABLE

**POST OR FILE AT INSTALLATION ADDRESS**

2. The permittee has elected to opt-out of being issued a major source operating permit pursuant to Division Rule 1200-3-9-.02(11)(a). The permittee would be considered a major source because their “potential to emit” value for volatile organic compounds (VOC) was greater than 100 tons per year at the time of application. The permittee has agreed to be subject to limitations in order to be below the major source applicability threshold for VOC of 100 tons per year.
3. Any non-compliance with any condition(s) of this permit set to restrain the “potential to emit” below the applicability thresholds of 1200-3-9-.02(11) of the Tennessee Air Pollution Control Regulations shall be reported in writing to the Technical Secretary within three (3) working days of such discovery. This notification, at a minimum, shall include the identification of the source, identification of the permit condition(s) violated, and details of the violation.
4. The permittee is placed on notice that **Condition 8** of this permit contains limitations that allow the permittee to opt out of the major source operating permit program requirements specified in Division Rule 1200-3-9-.02(11). Failure to abide by these limits will not only subject the permittee to enforcement action by the State of Tennessee, but it may also result in the imposition of Federal enforcement action by the United States Environmental Protection Agency and the loss of being Federally recognized as a conditional major source.
5. A report stating the compliance status of this facility with **Condition 8** shall be submitted by March 31 of every year, beginning in the year 2005. This report shall cover the preceding calendar year and shall include the records required by **Condition 10**. The report shall be submitted to the Johnson City Environmental Assistance Center at the following address:
- Johnson City Environmental Assistance Center  
Division of Air Pollution Control  
2305 Silverdale Road  
Johnson City, TN 37601-2162
6. Should proof of compliance for the pollutant with emission limitations placed on this permit be required, the emissions measuring test method(s) and procedures are the following:

Pollutant or Parameter	Testing Methodology
Volatile Organic Compounds	EPA Method 24 as published in the current 40 CFR 60, Appendix A

7. Purchase orders and/or invoices or a record of purchase orders and/or invoices for all VOC-containing materials must be maintained and kept available for inspection by the Technical Secretary or his representative. These records must be retained for not less than five (5) years.

8. Volatile organic compounds (VOCs), excluding water and/or exempt compounds, emitted from this source shall not exceed 98.0 tons per 12 consecutive months.

This emission limitation is established pursuant to Rule 1200-3-9-.02(11)(a) of the Tennessee Air Pollution Control Regulations and the information contained in the letter dated November 20, 2000, from the permittee. The permittee has requested this limit in order to avoid Title V status and to avoid requirements of Rule 1200-3-18-.20. Compliance with this requirement may be indicated by the records required by **Condition 10**.

9. The as-supplied VOC content of all VOC-containing materials to be used by this facility shall be determined as follows:

All Coatings, Thinners, Solvents, etc. - from Material Safety Data Sheets (MSDS), manufacturer or vendor formulation data, which explicitly list the VOC content by weight.

The results of these determinations shall be compiled in the following tabular format or an alternative format providing the same information. This table, along with MSDS or other supporting documentation for each material used, shall be maintained at the source location and made available for inspection by the Technical Secretary or his representative, beginning 30 days from the issue date of this permit. If new materials are used, or if material formulation is changed, the table shall be updated within 90 days from the initial date of usage of the new or altered material.

Process Material Description	Material Density (lb/gal)	VOC Content (lb/gal)
Material #1		
Material #2		
etc.		

10. The permittee shall calculate the actual quantities of VOC and hazardous air pollutants (HAP) emitted from this facility during each calendar month and during each twelve (12) consecutive-month period; and maintain records of these emissions in a form that readily shows compliance with **Condition 8** of this permit (See example below). This log must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. These logs must be retained for a period of not less than five (5) years.

**Log 1 – Monthly log of input materials**

Month and Year:								
Process Material	Usage (gal/month)	VOC Content (lb/gal)	VOC Emitted (tons/ month)	HAP 1 Content (lb/gal)	HAP 1 Emitted (tons/month)	HAP 2 Content (lb/gal)	HAP 2* Emitted (tons/month)	Total HAP Emitted (tons/month)
Coating 1								
Coating 2*								
Thinners*								
Solvents*								
<b>Total Emitted (tons per month)</b>								

\* This table may be expanded to include additional materials and/or HAP as necessary.

**Log 2 – Yearly Log**

Month and Year	VOC Emitted (tons/month)	VOC Emitted (tons per 12 months)*	HAP 1 Emitted (tons/month)	HAP 1 Emitted (tons per 12 months)	HAP 2 Emitted (tons/month)	HAP 2 Emitted (tons per 12 months)	Total HAP Emitted (tons/month)	Total HAP Emitted (tons per 12 months)

\* The tons per 12 month value is the sum of the VOC and/or HAP emissions in the 11 months preceding the month just completed + the VOC and/or HAP emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this table, this value will be equal to the value for tons per month. For the second month it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed [i.e., 6 (2) represents 6 tons emitted in 2 months].

## 11. In the event that either

- a. The maximum emission rate from this facility of any single HAP, listed pursuant to Section 112(b) of the Federal Clean Air Act equals or exceeds 10.0 tons during any interval of twelve consecutive months, or
- b. The maximum emission rate from this facility of any combination of HAP equals or exceeds 25.0 tons during any interval of twelve consecutive months,

the permittee shall provide written notification of the exceedance(s) to the Technical Secretary within fifteen (15) days from the date of discovery. If potential emissions from this facility equal or exceed these rates, the facility will be declared a major source under Title V of the Federal Clean Air Act. Additionally, this source will be subject to 40 CFR 63, Subpart M - National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products.

## 12. This permit supersedes any previous permits issued for this facility.

## 13. Visible emissions from this source shall not exhibit greater than twenty percent (20%) opacity as determined by EPA Method 9 [as specified in Rule 1200-3-5-.03(6)], as published in the current 40 CFR 60, Appendix A. (six-minute average)

## 14. The permittee shall apply for renewal of this permit not less than sixty (60) days prior to the permit expiration date, pursuant to 1200-3-9-.02(3).

(end of conditions)